

EXHIBIT Z

Contains Highly Confidential AEO and Source Code Materials

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

SAN FRANCISCO DIVISION

GOOGLE LLC,

Plaintiff

v.

SONOS, INC.,

Defendant.

CASE NO. 3:20-cv-06754-WHA

Related to CASE NO. 3:21-cv-07559-WHA

**SUPPLEMENTAL EXPERT REPORT OF DR. DAN SCHONFELD REGARDING
CLAIM 1 OF U.S. PATENT NO. 10,848,885**

Contains Highly Confidential AEO and Source Code Materials

TABLE OF CONTENTS

	<u>Page</u>
I. BACKGROUND	1
II. THE COURT’S JULY 21, 2022 ORDER RE CROSS MOTIONS FOR PARTIAL SUMMARY JUDGMENT AS TO CLAIM 1 OF ’885 PATENT	2
1. “Zone Scene”	2
(a) Court’s Order	2
(b) Sonos’s Own Prior Art System	4
(c) Logitech Prior Art System	22
(d) Bose Prior Art System	32
2. “Indication” that a “zone player has been added,” and the “indication” identifying “at least the first zone player and second zone player.”	34
(a) Court’s Order	34
(b) Sonos’s Own Prior Art System	35
(c) Logitech Prior Art System	37
(d) Bose Prior Art System	57
3. Written Description.	63
III. RESERVATION OF RIGHTS	69

Contains Highly Confidential AEO and Source Code Materials

I. BACKGROUND

1. I have been retained as an expert witness in this action on behalf of Google, LLC (“Google”) to testify as a technical expert concerning the technology at issue in U.S. Patent No. 10,848,885 (“the ’885 patent”). I understand that the parties have agreed to submit expert reports relating to Claim 1 of the ’885 patent. In this Expert Report, I provide supplemental opinions on the invalidity of Claim 1 of the ’885 patent, in view of the Court’s July 21, 2022 Order.

2. I am being compensated for my work on this case at my standard consulting rate of \$600/hr. My compensation is not contingent upon the results of my analysis or the substance of my testimony.

3. I expect to be called to provide expert testimony regarding opinions formed based on my analysis of the issues considered in this Report. I may also discuss my own work and publications in the field and knowledge of the state of the art in the relevant time period. I may rely on handbooks, textbooks, technical literature, and the like to demonstrate the state of the art in the relevant time period and the evolution of relevant technologies. I reserve the right to modify or supplement my opinions, as well as the basis for my opinions, based on the nature and content of the documentation, data, proof, and other evidence or testimony that Sonos, Inc. (“Sonos”), or its expert(s) may present, or based on any additional discovery or other information provided to me or found by me in this matter. All of the opinions stated in this Report are based on my current personal knowledge and professional judgment, and if called as a witness during the trial in this matter, I am prepared to testify competently about them. I reserve the right to use and rely on certain demonstratives to do so. I also reserve the right to amend and/or supplement this Report should additional information or developments that may affect my opinions become available.

4. In reaching the conclusions described herein, I have considered the documents and materials identified and/or cited in this Report, as well as any materials listed in Exhibit A. My